

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ALABAMA EASTERN DIVISION**FILED****Candace Alexander,**

2025 JUL 21 A 9:39

Plaintiff

U.S. DISTRICT COURT
N.D. OF ALABAMA

v.

lcw

Jameka Scales, Corey Bennett, Patrick Bennett, and Vickie Bennett,

Defendants

Civil Action No. 1:25-cv-00980-CLM

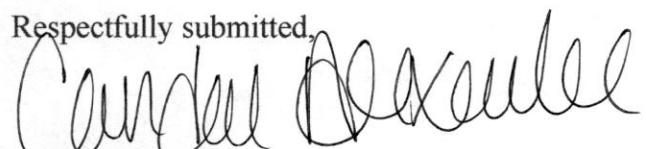
NOTICE REGARDING DEFENDANTS' STATEMENT ON GEOGRAPHIC DISTANCE FROM COURT

COMES NOW the Plaintiff, Candace Alexander, and submits this Notice to correct the record regarding the Defendants' collective assertion that they do not have significant ties to the Northern District of Alabama or proximity to this Court.

1. In their jointly filed "Motion for Extension of Time to Respond to Complaint," the Defendants state that they mostly reside outside Alabama and "do not have any significant relationships with qualified legal counsel in the Northern District of Alabama."
2. While Plaintiff does not dispute the locations of Defendants Corey, Vickie, or Patrick Bennett, public records confirm that **Defendant Jameka Scales maintains an address in Harvest, Alabama** — within the Northern District of Alabama.
3. This proximity places both **Plaintiff (in Owens Cross Roads)** and **Defendant Jameka Scales (in Harvest)** within a short drive of the Northern District of Alabama courthouse. **Neither party can credibly claim geographic hardship** in accessing this Court or its resources.
4. In fact, Defendant Scales resides less than 30 miles from the courthouse and is within the Court's jurisdiction. Her assertion of lacking meaningful geographic connection to this Court is therefore inaccurate.
5. Further, her location suggests she could **personally deliver any filings** or engage counsel from the local legal community just as Plaintiff has done pro se.
6. Notably, **Keith Alexander** — the very individual targeted by Defendant Corey Bennett's affidavit — was able to retain legal counsel within **21 days** of being served (May 12, 2025). In that time, counsel appeared on his behalf, entered a **not guilty plea**, and ensured Mr. Alexander's appearance in **Tishomingo County Justice Court on June 3, 2025**. Keith Alexander had **no prior relationships with attorneys** in that jurisdiction and resided out-of-state, yet encountered no delay in navigating the legal process. This further undercuts Defendant Scales' claimed difficulty in accessing legal resources while residing just 30 minutes from the courthouse.

WHEREFORE, Plaintiff submits this Notice for the Court's consideration and reserves the right to supplement the record with public records confirming Defendant Scales' residence, if necessary.

Respectfully submitted,



Candace Alexander

7415 Nature Walk Way SE

Owens Cross Roads, AL 35763

Pro Se Plaintiff